

9 MAY 1977

MEMORANDUM FOR: Deputy Director of Central Intelligence

FROM : John F. Blake
Deputy Director for Administration

SUBJECT : Agency Files

STAT 1. You will recall that at a recent morning meeting following the [] letter to the Director, there was considerable discussion relating to Agency files and their maintenance. At the conclusion of this discussion, you asked me for a paper which spoke to this subject and which would address itself, additionally, to the question of the integrity of the files that we currently maintain.

2. Attached is a paper such as you requested which has been prepared by the Information Systems Analysis Staff of the DDA. I believe two points are obvious from a review of this paper which are very worthy of serious consideration. They are:

a. There has been an Agency tradition of decentralized file maintenance.

b. Given our present systems, the integrity of our files and their proper utilization depends to a large extent on the dedication and professionalism of the individual custodians of those files.

3. I believe it is becoming increasingly obvious that if we are to make significant improvements in our systems of record and the proper use thereof, we must establish centralized policies and mechanisms for the implementation of these policies. We have recently recommended to you and received your approval of a centralized declassification group. I believe this is but one of many recommendations which we will make in the immediate future for changes from our traditional ways in the field of records management. I am hopeful that we will be able to present these recommendations in such a manner that you will agree with us that they

warrant your continuing support. Centralized control of procedures is not a course of action which lends itself to overwhelming support from Agency components. However, I am convinced, as a result of our experiences of the last two years, that Agency-wide standardization and monitoring of records systems and management is essential.

/s/ John E. Blake
John F. Blake

Attachment: a/s

STATINTL AI/DDA [redacted] ydc (6 May 77)
Distribution:

Original - Addressee

1 - ER w/att

✓ - ISAS w/att

✓ - RAB Subj.

1 - RAB Chrono

6 May 1977

AGENCY FILES

1. The Agency does not have a single, centralized filing system. Agency files reflect the diverse functions they document and support, and filing operations are managed along the same decentralized lines as other Agency operations. The Agency Records Management Officer (Chief, Information Systems Analysis Staff, (ISAS) DDA), is responsible for the general management of Agency records. Each of the four directorates has a Directorate Records Management Officer, who serves as the link between ISAS and the component records management officers, and is responsible for management of records and files throughout the directorate. The independent offices have records management officers performing similar functions.

2. Although ISAS publishes a Subject Filing Handbook and provides training in general subject filing systems, the day-to-day filing operations of the Agency are the responsibility of the custodian of each series of records, in conjunction with the component records management officer. Files are usually established to serve the needs of the employees performing a particular function. The filing system that best serves that function may be subjective, numeric, subject-numeric, terminal digit, or otherwise arranged. The files may be established informally, as analyst's reference files and working files, or formally, as official files. Records may move from working files to official files at various stages in the process of project completion or report preparation.

3. At some point, a decision must be made on just which files are official and on how long and where they are to be maintained. These decisions are made by establishing records control schedules covering all series of records in the Agency including paper, film, and magnetic records. Records control schedules are required in all agencies by federal law and under the law, the Archivist of the United States must approve these schedules. The Agency, in coordination with the National Archives and Records Service (NARS), has developed approved procedures for submitting schedules to the Archivist in a manner that protects sources and methods.

4. NARS has recently combined their files maintenance and records disposition functions. Independently, the Agency has been working along the same lines. Agency records managers are developing procedures for identifying files, as soon as they are created, with the item in the records control schedule that provides instructions for their ultimate disposition. This process will eliminate the problem of trying to appraise the value of a file years after the purpose for its creation has passed.

5. A primary objective in scheduling Agency records is to identify the "record copy" of a particular record. The record copy is the copy that is maintained in accordance with the primary administrative, fiscal, legal, and historical retention requirements specified in the records control schedule. In identifying record copies, there are two basic types of files: general and specialized.

a. General files--such as personnel, training, and supply files--are found in most offices, in forms such as soft files and requisition files. In most cases the official record file is maintained in the DDA office charged with the related function. Thus, the DDA office's files must be maintained in accordance with legal requirements while all other offices may dispose of their copies when no longer needed for current operations. General files are covered by records schedule instructions based on government-wide General Records Schedules.

b. Specialized files--such as imagery analysis and radio frequency files--are maintained in a limited number of offices, or perhaps only one. These file series must be identified in greater detail in the records schedule, and disposition of the record copy is directly related to the function it serves in the office of primary interest.

6. Access to Agency files is generally based on the "need-to-know" principal. This is particularly true with sources and methods information and with special compartmented information. It is also the case with personnel information, especially since passage of the Privacy Act of

1974. Information access controls are part of the general office procedures in each component and are designed to provide employees with only that sensitive information they need to perform their duties.

7. In addition to management of records by custodians and Agency records management officers, approval of schedules by NARS, and "need-to-know" access requirements, there are further controls on Agency files. Before disposing of records that have reached their scheduled destruction date, a final determination must be made, in conjunction with the Office of General Counsel, that the records are not related to actual or pending litigation, to matters under investigation by the Department of Justice, or to pending Freedom of Information Act or Privacy Act requests to the Agency. Finally, the Senate Select Committee on Intelligence is currently establishing procedures for reviewing selected Agency records before they are destroyed.

8. As described above, Agency files are decentralized, but are subject to central controls, both internal and external. Although a standardized filing system is not appropriate for the Agency's diverse records, a more comprehensive approach to filing is desirable. The current process of scheduling all Agency records and tying them directly to the functions they serve provides the basis for such an approach.

9. The Agency is also in the process of organizing a 30-Year Records Review Program in response to the instructions set forth in Executive Order 11652. This Executive Order requires that all permanent, classified records should be systematically reviewed by their thirtieth year and either:

a. Declassified and offered to NARS for permanent retention; or

b. Determined to require continued classification which necessitates certification in writing by the Director of CIA. This certification authority may not be delegated. Classification may be retained or extended past the 30 year time limit only if declassification would:

(1) effect national security; or

(2) place an individual in immediate personal jeopardy.

A new branch under ISAS, the Records Review Branch (RRB), has been approved which will conduct a centralized 30-Year Records Review Program for the Agency. It is expected that the RRB will initially require a staff of some 40 full-time employees in order to review the tremendous quantity of classified records that have been produced by the CIA.

10. Given a system as large and complex as the one with which we are dealing, the opportunity for improper manipulation of information will always exist. No matter what filing systems we use or what controls are applied, the integrity of the Agency's records rests ultimately with the integrity of each employee using them. We believe that the Agency's overall track record in this regard has been relatively good, but we also recognize that improvements must be made in our current systems to further reduce opportunities for improper manipulation of file material by individual employees. Recent developments in the Agency's public responsibilities relating to Freedom of Information, Privacy, and Executive and Congressional oversight have served to highlight the importance of proper Agency filing practices. We believe that the increasing awareness of this situation among employees at all levels provides the environment necessary for establishing improved records management procedures throughout the Agency.

TATINTL

DDA/ISAS/RAB/[] jlb (6 May 1977)